

PAIA Manual of CA Sales Holdings Limited (Private Body)

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)
in respect of CA Sales Holdings Limited (the CA&S Group) and its operating entities.

Compiled: **6 September 2023** | Updated: **May 2026**

Registration number: 2011/143100/07

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1. Introduction

CA Sales Holdings Limited is a dual-listed holding entity comprising of a collective of well-established FMCG service businesses operating across Africa, that offer route-to-market solutions to the top international and leading local brand owners of consumer packed goods

The Company forms part of a group providing route-to-market, distribution, retail execution, brand activation and related support services to manufacturers, suppliers and retailers within the fast-moving consumer goods sector across Southern and East Africa.

This manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") to facilitate requests for access to records held by the Company.

The manual is intended to assist members of the public to understand the nature of records held by the Company and the process to be followed when requesting access to such records.

2. The Act

The Promotion of Access to Information Act 2 of 2000 gives effect to the constitutional right of access to information held by the State and by private bodies where such information is required for the exercise or protection of any rights.

In terms of PAIA, a requester may submit a request for access to records held by a private body. The Act, however, recognises that such right of access is subject to certain limitations, including the protection of privacy, confidentiality, and commercially sensitive information.

The Act sets out the procedural requirements that must be followed when requesting access to information and the grounds upon which a request may be refused.

3. Purpose of the Manual

To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of The Act for them to exercise their rights in relation to public and private bodies.

This manual is intended to:

- » Provide a description of the records held by the Company
- » Explain how to request access to such records in terms of PAIA
- » Describe the categories of information available without a formal request
- » Outline the processing of personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA")
- » Provide contact details of the Information Officer and Deputy Information Officers
- » Assist requesters in exercising their rights in a lawful and structured manner

The manual also promotes transparency, accountability and proper governance in accordance with South African legislation.

4. General Information and Contact Details:

Name of Private Body:	CA Sales Holdings Limited trading as: CA&S Group
Registration No:	2011/143100/07
Physical Address (principal place of business) and Postal Address:	1 st Floor, Building C, West End Office Park, 245 Hall Street, De Hoewes, Centurion, Pretoria, 0157
Telephone No:	(+27) 12 425 3200
General E-mail address:	info@cas.group
Website:	https://casholdings.co.za/
Information Officer:	Lance Sayce
Deputy Information Officer/s:	Frans Reichert
Administration Officer/s:	Vanessa Brandt

5. Guide on how to use PAIA and how to obtain access to the Guide

- 5.1 The Regulator has, in terms of Section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act 4 of 2013 ("POPIA").
- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 The aforesaid Guide contains the description of-
- 5.3.1 the objects of PAIA and POPIA;
 - 5.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of- the Information Officer of every public body, and
 - 5.3.3 every Deputy Information Officer of every public and private body designated in terms of Section 17(1) of PAIA and Section 56 of POPIA;
 - 5.3.4 the manner and form of a request for-
 - » access to a record of a public body contemplated in Section 11 of PAIA; and
 - » access to a record of a private body contemplated in Section 50 of PAIA;

5.3.5 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

5.3.6 the assistance available from the Information Regulator in terms of PAIA and POPIA;

5.3.7 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

- » an internal appeal;
- » a complaint to the Regulator; and
- » an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

5.3.8 the provisions of Sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

5.3.9 the provisions of Sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

5.3.10 the notices issued in terms of Sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and

5.3.11 the regulations made in terms of Section 92 of PAIA.

5.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5.5 The Guide can also be obtained-

5.5.1 upon request to the Information Officer;

5.5.2 from the website of the Information Regulator (<https://info regulator.org.za/>).

5.6 A copy of the Guide is also available in two official languages, for public inspection during normal office hours.

6. Records automatically available to the public

Category of records	Types of the Record	Availability
Service information	Information relating to our service offering	Freely available
Public facing policies and notices	Privacy Notice, Terms and Conditions, PAIA Manual	Freely available

7. Records of the private body

This clause serves as a reference to the records that CA Sales Holdings Limited holds to facilitate a request in terms of The Act.

It is recorded that the accessibility of the documents listed below may be subject to the grounds of refusal set out hereinafter.

Subjects on which the body holds records

Categories of records

These include, but are not limited to the following:

Incorporation documents and records	» Incorporation documents; » Memorandum of Incorporation » Articles of Association; » Shareholders agreement; » Minutes of meetings
Human Resources	» HR policies and procedures; » Employee records
Operational documents and records	» Policies regarding business plan or activities; » Written service specification; » Customer data base and relevant information; » Company profile; » Sales records
Financial records	» General » VAT records; » Tax records; » PAYE records; » UIF records; » SDL records; » Management accounts and audited financial statements; » Operating systems » Tax invoices; » Quotes; » weekly/monthly/quarterly/annual statements; » Debit notes; » Credit notes » Bank Account records

8. Records required in terms of legislation

Records are kept in accordance with legislation applicable to the CA&S group, which includes but is not limited to, the following –

Basic Conditions of Employment Act 75 of 1997;
Broad-Based Black Economic Empowerment Act 53 of 2003;
Businesses Act 71 of 1991;
Close Corporations Act 69 of 1984;
Companies Act 71 of 2008;
Compensation of Occupational Injuries and Diseases Act 130 of 1993;
Copyright Act 98 of 1978;
Currency and Exchanges Act 09 of 1933;
Customs and Excise Act 91 of 1964;
Cybercrimes Act 19 of 2020;
Electronic Communications Act 36 of 2005;
Electronic Communications and Transactions Act 25 of 2002;
Employment Equity Act 55 of 1998;
Financial Intelligence Centre Act 38 of 2001;
Identification Act 68 of 1997;
Income Tax Act 58 of 1962;
Labour Relations Act 66 of 1995;
National Credit Act 34 of 2005;
National Minimum Wage Act, 09 of 2018;
Occupational Health and Safety Act 85 of 1993;
Prevention of Organised Crime Act 121 of 1998;
Promotion of Access to Information Act 2 of 2000;
Protection of Personal Information Act 4 of 2013;
Revenue Laws Second Amendment Act 61 of 2008;
Skills Development Act 97 of 1998;
Skills Development Levies Act 9 of 1999;
Tax Administration Act 28 of 2011;
Taxation Laws Amendment Act 7 of 2010;
Unemployment Contributions Act 63 of 2001;
Value Added Tax Act 89 of 1991.

Although we have used our best endeavors to supply a list of applicable legislations, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows access on a basis other than as set out in PAIA, we will update the list accordingly. If a requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on.

Reference to the above-mentioned legislation shall include subsequent amendments and secondary legislation to such legislation.

9. Processing of personal information

9.1 Purpose of Processing Personal Information

We may process personal information for various reasons, including but not limited to the following:

- » To gather contract information;
- » To maintain customer and employee records;
- » For employment and payroll purposes;
- » For general administration;
- » For legal, contractual, financial and/or tax purposes;
- » Compliance with legal and regulatory requirements;
- » To manage information, products and/or services requested by data subjects;
- » Health and safety purposes;
- » For the detection and prevention of fraud, crime, money laundering or other malpractice;
- » To conduct market or customer satisfaction research or for statistical analysis;
- » For audit and record keeping purposes;
- » In connection with legal proceedings.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	These include, but are not limited to the following: » Full Name and Surname; » Identity number; » Physical, postal and e-mail address; » Contact details; » Entity name; » Entity registration number; » Entity VAT number; » Full name and Surname of entity representative
Suppliers / Service providers	These include, but are not limited to the following: » Entity name; » Entity registration number; » Entity VAT number; » Full name and Surname of entity representative; » Contact details of entity representative; » Physical, postal and e-mail address; » Banking details; » Income Tax details

Employees

These include, but are not limited to the following:

- » Full Name and surname;
- » Identity number;
- » Date of birth;
- » Physical, postal and e-mail address;
- » Contact details;
- » Physical and postal address;
- » Gender;
- » Nationality;
- » Race;
- » Marital status;
- » Emergency contact information;
- » Banking details;
- » Educational details;
- » PAYE Information;
- » UIF Information

Directors and Shareholders

These include, but are not limited to the following:

- » Full Name and Surname;
- » Identity Numbers;
- » Other information required for reporting purposes

9.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Staff personal information relating to employment and tax	» Department of Labour » South African Revenue Services » Our payroll service providers and labour consultants
Staff personal information, for service offering towards customers	Our customers
Tax and VAT information of clients, service providers, suppliers	South African Revenue Services

9.4 Planned transborder flows of personal information

Personal information may be stored on cloud servers located outside of South Africa subject to POPIA safeguards. However, if the transfer of your personal information across South African borders are required, the transfer of the personal information will only be affected if the transaction requires transborder processing. In such instance the personal information will only be transferred in accordance with the requirements of POPIA and/or other South African legislative requirements, and/or if the data subject consents to the transferring of personal information to a third-party in a foreign country. In the event of transborder transferring of personal information we will take the necessary steps to ensure the processing of personal information is done in accordance with the laws of the jurisdiction the information is transferred to and/or that binding corporate rules or binding agreements are in place that provide for levels of protection at an adequate level in accordance with the principles of POPIA.

Note that we use productivity software solutions such as Microsoft 365 for our business-related administrative tasks and cloud storage. In addition, we make use of software and applications specifically developed for us by a third-party to fulfil our operational requirements. The information collected through these third-party services and service providers may be stored on the servers of the software solution providers, which may be located outside the borders of South Africa.

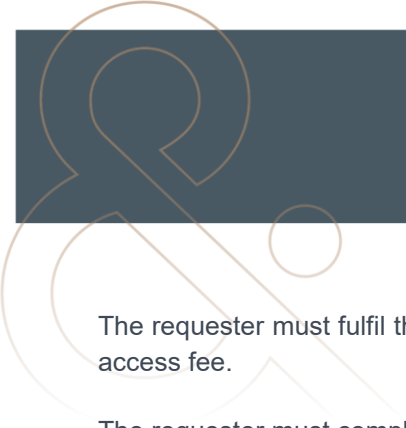
9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- » Our security policies and procedures cover, amongst others, but not limited to:
- » Physical security and computer and network security;
- » Access control to personal information;
- » Security in contracting out activities or functions;
- » Retention and disposal of information;
- » Acceptable usage of personal information;
- » Governance and regulatory issues;
- » Monitoring access and usage of personal information;
- » Investigating and reacting to security incidents;
- » When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure;
- » We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

10. Request procedure for obtaining information

Access to records held by CA&S Group

Records held by CA Sales Holdings Limited may be accessed by request only once the prerequisites for access have been met.



The requester must fulfil the prerequisites for access in terms of The Act, including the payment of a requested access fee.

The requester must comply with all the procedural requirements contained in The Act relating to the request for access to a record.

The requester must complete the prescribed Form 2 (Annexure A) and submit same as well as payment of a request fee and a deposit, if applicable, to the Information Officer at the postal or physical address, fax number or electronic mail address as stated herein.

The prescribed form must be filled in with enough particulars to at least enable the

Information Officer to identify –

The record or records requested;

The identity of the requester,

Which form of access is required, if the request is granted;

The postal address or fax number or email address of the requester.

The requester must state that they require the information in order to exercise or protect a right and clearly state what the nature of the right to be exercised or protected is. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

CA Sales Holdings Limited will process the request within 30 days, unless the requester has stated a special reason that would satisfy the Information Officer that circumstances dictate that the above time periods are not complied with.

The requester shall be informed whether access has been granted or denied in the form of Form 3 (Annexure B). If, in addition, the requester requires the reason for the decision in any other manner, they must state the manner, and the particulars so required.

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer.

If an individual is unable to complete the prescribed Form because of illiteracy or disability, such a person may make the request orally.

11. Fees

When the Information Officer receives the request, such Officer shall, by notice, require the requester to pay the prescribed request fee (if any), before any further processing of the request.

If the search for the record has been made in the preparation of the record for disclosure, including arrangements to make it available in the requested form, and it requires more than the hours prescribed in the regulation for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

The Information Officer shall withhold a record until the requester has paid the Fees as indicated.

A requester, whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required more than the prescribed hours to search for and prepare the record for disclosure, including making arrangements to make it available in the requested form.

If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester. The fees applicable to a request for information are set out in Annexure B hereto.

The requester must pay the prescribed fee before any further processing can take place.

12. Grounds for refusal of access to information

The main grounds for CA Sales Holdings Limited to refuse a request for information relate to the:

- » Mandatory protection of the privacy of a third party that is a natural person that would involve the unreasonable disclosure of personal information of that natural person;
- » Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that third party;
 - Financial, commercial, scientific or technical information, disclosure of which could likely cause harm to the financial or commercial interests of that third party;
 - Information disclosed in confidence by a third party to the Private Body, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- » Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- » Mandatory protection of confidential information of the protection of property;
- » Mandatory protection of records that would be regarded as privileged in legal proceedings;
The commercial activities of CA Sales Holdings Limited may include:
 - Trade secrets of CA Sales Holdings Limited
 - Financial, commercial, scientific or technical information, disclosure which could likely cause harm to the financial or commercial interest of CA Sales Holdings Limited;
 - Information which, if disclosed, could put CA Sales Holdings Limited at a disadvantage in negotiations or commercial competition;
 - A computer program, owned by CA Sales Holdings Limited and protected by copyright.
- » The research information of CA Sales Holdings Limited or a third party, whether its disclosure would reveal the identity of CA Sales Holdings Limited, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

Requests for information that are clearly frivolous or vexatious, or which would involve an unreasonable diversion of resources shall be refused.

13. Decision

CA Sales Holdings Limited will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

The requester should be informed whether access has been granted or denied in the form of Form 3 (Annexure B). If, in addition, the requester requires the reason for the decision in any other manner, they must state the manner, and the particulars so required.

The 30 day period within which CA Sales Holdings Limited has to decide whether to grant or refuse the request, may be extended for further period of not more than 30 days if the request is for a large amount of information, or the request requires a search for information held at another office of CA&S Group and the information cannot reasonably be obtained within the original 30 day period. CA Sales Holdings Limited will notify the requester in writing should an extension be sought.

14. Availability of the manual

The manual of CA Sales Holdings Limited is available at the premises of CA Sales Holdings Limited as well as on the website of CA Sales Holdings Limited

15. PAIA Manual updates

The Information Officer of CA Sales Holdings Limited will on a regular basis update this manual

ISSUED BY:

FRANS REICHERT
DEPUTY INFORMATION OFFICER

DATE: 1 MAY 2026

16. Annexures

Annexure A: Form 2 – Request for Access to Record {Regulation 7}

<https://info regulator.org.za/paia/>



Form 2-PAIA.pdf

Annexure B: Form 3 - Outcome of request and fees payable {Regulation 8}

<https://info regulator.org.za/paia/>



Form 3 - PAIA.pdf